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July 16, 2019

VIA ECF

The Honorable Steven M. Gold
Chief Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Saldarriaga v. IND Glatt, Inc. et al.*
Case No. 1:17-cv-02904-PKC-SMG

Dear Judge Gold:

As Your Honor is aware, this firm represents Defendants IND Glatt, Inc. (“IND Glatt”) and David Yizhaky (collectively, “Defendants”) in the above-referenced action. Pursuant to Your Honor’s July 3, 2019 order (Doc. No. 40), the parties hereby jointly submit a revised and fully-executed Settlement Agreement and General Release, with the instructed modification to section 8 (Non-Disparagement). As Your Honor ordered, the agreement has been revised to include a carve-out for truthful statements about the instant litigation.

We trust the parties’ revised agreement now satisfies Your Honor’s requirements for settlement approval. We therefore respectfully ask the Court to approve the Parties’ Settlement Agreement and General Release.

Respectfully submitted,

SEYFARTH SHAW LLP

Dov Kesselman

cc: Paul Hershan, Esq. (via ECF)
Stacey Bentley, Esq. (via ECF)

